STIPULATED MOTION AND ORDER REGARDING CLASS CERT. BRIEFING (Case No. 2:20-cv-00424-JHC)

Case 2:20-cv-00424-JHC Document 311 Filed 04/21/25 Page 1 of 5

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STIPULATION

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The parties, by and through their counsel, have agreed and stipulate as follows:

- 1. The Court entered the parties' stipulated motion regarding expert discovery, which, among other things, requires parties to produce a "copy of all data and other information relied upon by the expert in forming their opinions for such report, including, but not limited to, underlying data, spreadsheets (including formulas therein), computerized regression analysis and/or other underlying reports, programs, computer codes and schedules sufficient to reconstruct the work, calculations, and/or analyses upon which the testifying expert is relying for their opinions" (the "Backup Material") "[w]ithin three (3) business days after service of a report under Rule 26(a)(2)(B)." Dkt. 121 ¶ 10.
- 2. Plaintiffs filed their class certification motion on February 20, 2025, along with a report of Dr. Pathak. Dkt. 266. Amazon was not able to access the complete back-up material until March 19, 2025.

THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the parties, through their undersigned counsel of record, and the parties ask the Court to order, that:

3. The class certification deadlines in *Frame-Wilson*, Dkt. No. 247, are modified as follows: Amazon's deadline to oppose Plaintiffs' class certification motion is **June 6, 2025**; Plaintiffs' deadline to file their reply in support of class certification is **August 8, 2025**.

IT IS SO STIPULATED.

DATED: April 21, 2025 DAVIS WRIGHT TREMAINE LLP

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STIPULATED MOTION AND ORDER REGARDING CLASS CERT. BRIEFING (Case No. 2:20-cv-00424-JHC) - 4